

## REMARKS

In the Office Action dated July 12, 2004, the Examiner rejected claims 1-20 under 35 U.S.C. § 103 as being unpatentable over *Bjornson et al.* (U.S. Pat. No. 6,173,210) in view of *Salvo et al.* (U.S. Pat. No. 6,341,271). Claims 1-20 were also rejected under the obviousness-type double patenting doctrine as being unpatentable over claims 1-30 of U.S. Pat. No. 6,675,055. Applicants have amended claims 1-7, 9, and 17-21, cancelled claims 8 and 10-16, and have submitted new claims 21-27. For the reasons given below, Applicants respectfully submit that *Bjornson* and *Salvo*, taken either alone or in combination, do not disclose, teach, or even suggest the presently claimed invention.

The presently claimed invention is directed to a system and method for configuring and manufacturing injection molding and hot runner systems that overcomes the problems associated with the non-automated, non-computerized prior art systems and methods for configuring and manufacturing injection molding systems. As correctly noted by the Examiner in the Office Action, *Bjornson* fails to disclose any system or method for configuring and manufacturing injection molding systems. Contrary to the Examiner's representation, however, *Salvo* also does not disclose a system or method for configuring and manufacturing injection molding systems. Rather, the disclosure by *Salvo* is directed to an inventory management system that automatically monitors inventory amounts (e.g., manufacturing materials contained in silos), provides information concerning the inventory, and decides if an order for replacement inventory should be placed. Although *Salvo* discusses that an injection molder may be used to make products from its inventory, there is simply no mention by *Salvo* of manufacturing or configuring injection molding systems themselves.

The above amendments make clear that the present invention is limited to a system and method for the configuring and manufacturing of injection molding systems (or portions thereof), such as manifolds and hot runner systems. In particular, the independent claims of the presently claimed invention require various combinations of (a) a computerized configuring subsystem for generating a customized injection molding system; (b) a computerized business subsystem for calculating the cost and determining the time schedule for manufacturing the designed injection molding system; (c) a computerized processing subsystem for processing the configured injection molding system to provide drawings; (d) a computerized manufacturing subsystem for providing input for manufacturing the customized injection molding system; and/or (e) partially manufacturing a plurality of hot runner components, placing the components in inventory, receiving one or more customer defined parameters, removing the hot runner components from inventory, and further manufacturing the hot runner components in accordance with the customer defined parameters to create the customized hot runner system. As a result of these elements, the claimed invention provides an automated, computerized system and method for specifying, ordering, designing, configuring, processing, and/or fast manufacturing of an injection molding/hot runner system.

Neither *Bjornson* nor *Salvo* disclose any such systems or methods for configuring and manufacturing injection molding systems, and *Bjornson* and *Salvo* simply do not teach or suggest any solution to the problems associated with prior art designing, configuring, processing, and ordering of complex injection molding systems. Consequently, neither *Bjornson et al.* nor *Salvo et al.* render the presently claimed invention obvious, alone or in combination with each other. Accordingly, Applicants

respectfully request that the Examiner withdraw the rejection of the claims under 35 U.S.C. § 103. Applicants believe the present claims to be in condition for allowance, and earnestly request early notification of same.

With respect to the Examiner's double patenting rejection, Applicants submit herewith a terminal disclaimer to overcome this rejection. In light of the accompanying terminal disclaimer, Applicants respectfully request that the Examiner withdraw the double patenting rejection.

If, for any reason, the Examiner is unable to allow the application on the basis of this amendment and feels that a telephone conference would help clear up any unresolved matters, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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